

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: DOMINICK TALARICO and : CHAPTER 13
MAUREEN TALARICO :
Debtor(s) :
 :
CHARLES J. DEHART, III :
STANDING CHAPTER 13 TRUSTEE :
Movant :
 :
vs. :
 :
DOMINICK TALARICO and :
MAUREEN TALARICO :
Respondent(s) : CASE NO. 5-17-bk-02412

TRUSTEE'S OBJECTION TO FIFTH AMENDED CHAPTER 13 PLAN

AND NOW, this 28th day of November, 2017, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:

- a. The plan is underfunded relative to claims to be paid. Base plan must be no less than \$117,848.00 to pay claims plus Trustee fees at the current rate of 6.50%.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Agatha R. McHale
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 28th day of November, 2017, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Raymond Ferrario, Esquire
538 Spruce Street
Scranton Life Bldg., Suite 528
Scranton, PA 18503

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee